# **Appendix E**

Letter from the Pacific Seabird Group to Channel Islands National Park Regarding Management Recommendations for Xantus's Murrelets August 15, 1994

Response letter back to the Pacific Seabird Group from Channel Islands National Park November 15, 1994

Letter from the Pacific Seabird Group to U.S. Fish and Wildlife Service Regarding Comments on Draft Restoration Plan: American Trader Oil Spill July 26, 2000

# Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

John Piatt Chair 1011 East Tudor Road Anchorage, Alaska 99503 (907) 786-3549 Craig S. Harrison Vice Chair for Conservation 4001 North Ninth Street #1801 Arlington, Virginia 22203 (202) 778-2240 William T. Everett Xantus' Murrelet Tech aical Committee P.O. Box 8123 La Jolla, California 92 38 (619) 589-0480

August 15, 1994

Mr. Mack Shaver, Superintendent Channel Islands National Park 1901 Spinnaker Drive Ventura, California 93001

Re: Xantus' Murrelet Conservation Suggestions

Dear Mr. Shaver:

At the 18 May meeting convened at the Western Foundation of Vertebrate Zoology by the Pacific Seabird Group (PSG), Tim Setnicka of the Channel Islands National Park offered to consider actions that the National Park Service could take in advance of the proposal to petition the Fish and Wildlife Service to place Xantus' Murrelet on the Endangered Species List. A draft list of recommendations was compiled at that meeting by Bill Everett, then circulated among all interested parties (including your staff) for comments.

Attached please find the final list of recommendations. PSG applauds your willingness to be proactive in this matter. Many of the suggestions are reasonably straightforward and could be implemented with minimal disruption of normal park operations.

We would be happy to provide additional information or assistance in further developing these conservation efforts. Although we realize that implementing some of these recommendations will take time, and that there are budgetary and other constraints, we are hopeful that when the petition is submitted to the FWS (anticipated March 1995), the park service will have already taken most of these steps. For further information on PSG's conservation recommendations, please call Bill Everett (619-589-0480).

We appreciate this opportunity to provide our expertise and views on these important issues.

Sincerely,

John Piatt Craig S. Harrison William T. Everett

Enclosure

### RECOMMENDATIONS BY THE PACIFIC SEABIRD GROUP TO THE CHANNEL ISLANDS NATIONAL PARK FOR THE CONSERVATION OF XANTUS' MURRELET

- 1. Consult with the Pacific Seabird Group (PSG) to revise the current research and monitoring program and to acquire more and better biological data on the species.
- 2. Conduct a thorough census on all Park Service islands, and refine and improve current census techniques. Make results of census work available to PSG and public in a timely fashion, to allow for evaluation of results and input on future census work.
- 3. Initiate a rat eradication program on Anacapa Island.
- 4. Implement policies to minimize the potential for rat introduction to Santa Barbara Island during the course of routine supply and material unloading.
- 5. Survey for rats at the Ventura Park Headquarters, particularly the dock area, and institute a control program, if necessary.
- 6. Develop a contingency plan to prepare for rapid response to accidental rat introduction to any of the Park Service islands via shipwreck.
- 7. Initiate a supplemental nest box program to provide additional sites for monitoring and research on Santa Barbara Island.
- 8. Review current procedures for equipment and material storage on Santa Barbara Island to reduce or eliminate any adverse impacts to nesting Xantus' Murrelets
- 9. Investigate and implement policies to control unnecessary use of bright deck lights by boats anchored at Santa Barbara Island.
- 10. Develop a contingency plan to assess threats to Xantus' Murrelets and advise the command structure in the event of an oil spill.
- 11. Develop a contingency plan to protect, rescue or rehabilitate Xantus' Murrelets in the event of an oil spill.
- 12. Initiate research to investigate the significance of mouse and owl predation on Xantus' Murrelets on Santa Barbara Island.

- 13. Enter into informal consultation with the U.S. Fish & Wildlife Service to consider possible mitigation for the relocation or removal of artificial structures on Sant 1 Barbara Island that may be used by nesting Xantus' Murrelets.
- 14. Organize an annual meeting on the status and conservation of Xantus' Murrelets in the Channel Islands National Park with participants from FWS, NPS, NBS, California Department of Fish & Game and other interested parties. PSG is willing to co-host some of these meetings during our regular annual conferences.



## United States Department of the Interior

NATIONAL PARK SERVICE Channel Islands National Park 1901 Spinnaker Drive Ventura, California 93001

November 15, 1994

John Piatt Pacific Seabird Group 1011 East Tudor Road Anchorage, AK 99503

Dear John:

Thank you for your letter of August 15, 1994, outlining the Pacific Seabird Group's recommendations to the Park concerning conservation of Xantus' Murrelets. Thoughts and comments on issues regarding Park resources are always greatly appreciated.

Projects and proposals submitted by researchers outside of the Park will be reviewed and accommodated whenever possible. However, current Park housing and transportation constraints restrict the number of people and projects that can take place at one time.

Our comments on your suggestions are enclosed. Once again, thank you for your excellent suggestions. In addition to the proposed annual conference to discuss the Xantus' Murrelet, please don't hesitate to contact us regarding your observations, concerns, and/or recommendations to assist in our mutual goal of species restoration.

Sincerely,

C. Mack Shaver Superintendent

cc: Craig Harrison
William Everett
Sarah Allen
Trudy Ingram

# RESPONSE TO RECOMMENDATIONS BY PACIFIC SEABIRD GROUP TO CHANNEL ISLANDS NATIONAL PARK FOR THE CONSERVATION OF XANTUS! MURRELET

- 1. The entire Seabird Monitoring program will be undergoing review in Fall 1995 and Xantus' Murrelets monitoring protocols will be revised along with protocols for other species. Pacific Seabird Group (PSG) along with others will be invited to be a part of the review process. Our hope is to collect the best biological data within/given our funding and logistical constraints.
- 2. Harry Carter/National Biological Survey began intensive census efforts of all Channel Islands in 1994. Plans for 1995 include additional surveys within the Park and the Park Service continues to support these efforts. The data collected as part of our seabird monitoring program is published in an annual report as soon as possible. The data is public and can be acquired sooner by writing to request it.
- 3. Funding to begin a rat eradication program on Anacapa Island is anticipated within two years. It has been the park's #1 priority for multi-year project funding. The park has tried to obtain funding for the rat eradication through oil spill and DDT mitigation funds, with no success to date.
- 4-6. A Pest Policy Plan which will include plans to minimize the potential introduction of weeds and rats to all Park islands is being written by the Park's seabird and plant restoration biologists. Rats and feral cats are known to live in the rocks surrounding Ventura Harbor.
- 7. A supplemental nest box program will be considered when we review the Seabird Monitoring Program.
- 8. As facilities have improved on Santa Barbara Island, storage space has become increasingly "murrelet proof". We are developing thoughts on how to educate park personnel about situations that would prove hazardous to murrelets or create ephemeral nest sites.
- 9. The Park is unable to control use of bright deck lights by boats anchored around the island. At this time the best option is for the island ranger to issue advisories during routine contacts. Further questions on establishing policies should be directed toward California State Fish and Game. We are open to other actions that the PSG would propose to mitigate this problem.
- 10-11. Park personnel will be participating in the Oil Spill Wildlife Response Team being coordinated by Point Reyes Bird Observatory CDFG/OSPR. As participants of the team, we will be a part of the incident command system should an oil spill occur in the Santa Barbara Channel. There are no plans for the park to develop its own individual contingency plan for murrelets.

- 12. Developing a research project to determine the significance of predation by mice and owls on XAMU at SBI is not very feasible. Projects such as rat eradication from Anacapa Island appear higher on the priority list when competing for Park monies. There is also insufficient personnel to devote to such a project at this time.
- 13. Future construction on Santa Barbara Island will be conducted outside of the Murre et breeding season as recommended by the Park Resource Management staff. There are no structures which offer significant artificial nesting habitat on Santa Barbara Island. US Fish & Wildlife Service will be consulted on unforeseen issues as they arise.
- 14. The Park will continue to participate in PSG's annual conferences. Information regarding the status and conservation of Xantus' Murrelets will be disseminated at PSG.

## RECEIVED

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Pacific Seabird Group



## DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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July 26, 2000

Carol Gorbics
U.S. Fish & Wildlife Service
2730 Loker Avenue West
Carlsbad, California 92008

Re: Comments on Draft Restoration Plan: American Trader Oil Spill

#### Dear Sir:

These are the Pacific Seabird Group's (PSG) comments on the draft restoration plan and EA for Seabirds injured by the American Trader oil spill off Huntington Beach, California ("Draft Plan"). PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG draws its members from the rim of the entire Pacific Basin, including the United States, Canada, Mexico, Japan, China, Australia, New Zealand, and Russia. Among PSG's members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird populations and refuges, and individuals with interests in marine conservation. Over the years we have advised and worked cooperatively with government agencies to further these interests. PSG has been especially active with regard to oil spill restoration.

The Draft Plan proposes spending about \$2.9 million for bird-related natural resource projects, specifically the following:

- 1. Creation, enhancement, protection of brown pelican communal roost sites;
- Seabird nesting habitat restoration at Anacapa Island;
- 3. Public education and awareness; and

4. International efforts for brown pelicans (educational and protection activities; eradication of exotics on Baja islands; monitoring of populations).

In general, PSG supports the projects that the Trustee agencies have proposed. We offer the following observations and comments with respect to the details of some of the proposals.

First, we applaud the Trustee agencies' decision to allow funds to be spent in Mexico to restore brown pelicans. We believe that restoration in Mexico will have very high value for the damaged pelican population, and are gratified that the agencies are applying sound ecological principles in their consideration of projects. PSG has been frustrated in commenting on other restoration plans where the trustee agencies have stated that restoration funds can only be used at the location where the injuries took place. We congratulate you for making this determination, and hope that other trustee agencies for other restoration plans elsewhere will allow restoration projects to be implemented far from the spill site where this makes ecological sense.

Second, we strongly believe that all projects should be subject to competitive bidding and, like projects funded by the Exxon Valdez trust fund, should use a standard request for proposal and a peer review process. Our experience has taught us that sole source contracts often cost much more for less return (and thus less benefit to seabirds) than competitively bid contracts. Moreover, there is a public perception that sole sourcing service contracts to those individuals or entities who represented the government as experts in the settlement negotiations is improper. When this occurs, it appears that the trustee agencies are improperly "paying off" individuals for providing the testimony that the government wished to elicit. The restoration process will be cleansed of such taints if all projects are awarded after competitive bidding.

Third, our members support public education programs that work in schools with bi-lingual educators teaching about marine food webs, the role seabirds play and the effects of pollution on the ocean environment. This could take the form of a rotating set of programs for school assemblies or visits to science departments on a regular basis over a number of years in the affected areas.

Finally, we understand that the trustee agencies have already let a large contract to remove black rats from Anacapa Island using funds from the American Trader settlement. PSG supports removal of predators on Anacapa Island and on other colonies where seabirds breed because they can do terrible damage. Nevertheless, we do not condone expending trustee funds before the public comment period has run.

PSG thanks you for this opportunity to comment on the Draft Plan.

Sincerely,

Craig S. Harrison

Vice Chair for Conservation